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October 6, 1981

MICHAEL J WAHOSKE
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880 W FIRST NATIONAL BANK BLDG
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(612) 227-8017

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ROCHESTER MINNESOTA 55903
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8 THIRD STREET NORTH
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1200 18TH STREET N W
WASHINGTON D C 20036
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312 FIRST NATIONAL BANK BLDG
WAYZATA MINNESOTA 55391
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30 RUE LA BOÉTIE
75008 PARIS, FRANCE
TEL (1) 562 32-50



Stephen Shakman, Esq.
Minnesota Pollution Control Agency
1935 W. County Road B2
Roseville, Minnesota 55113

Re: State of Minnesota, et al. v. Reilly Tar &
Chemical Corporation
File No. 670767

Dear Mr. Shakman:

Enclosed and served upon you by United States
mail please find Interrogatories to Defendant Reilly Tar &
Chemical Corporation (Set I) and Responses Thereto.

Please note that, with reference to Interrogatory
No. 80 and the response thereto, Reilly is in the process of
communicating with its workman's compensation insurer and
counsel therefor regarding the privileged nature of unproduced
documents which might be identified as relating to the
response. It is anticipated that the Response to Interrogatory
No. 80 may be supplemented in the future by such document
identification.

Very truly yours,

A handwritten signature in cursive script that reads "Michael J. Wahoske".

Michael J. Wahoske

MJW/kmd
Enclosure

File

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
FOURTH DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

and

STATE OF MINNESOTA, by its
Attorney General Warren Spannaus,
its Department of Health, and its
Pollution Control Agency,

Civil No. 4-80-469

SECOND AMENDED NOTICE OF
TAKING ORAL DEPOSITION

Plaintiff-Intervenor,

v.

REILLY TAR & CHEMICAL CORPORATION;
HOUSING AND REDEVELOPMENT AUTHORITY
OF ST. LOUIS PARK; OAK PARK VILLAGE
ASSOCIATES; RUSTIC OAKS CONDOMINIUM
INC.; and PHILIP'S INVESTMENT CO.,

Defendants.

and

CITY OF ST. LOUIS PARK,

Plaintiff-Intervenor,

v.

REILLY TAR & CHEMICAL CORPORATION,

Defendant.

and

CITY OF HOPKINS,

Plaintiff-Intervenor,

v.

REILLY TAR & CHEMICAL CORPORATION,

Defendant.

TO: James M. Rosenbaum, United States Attorney, Francis X.
Hermann, Assistant United States Attorney, 110 S. 4th Street,
Minneapolis, Minnesota 55401, and Erica L. Dolgin, Attorney,
Environmental Enforcement Section, Land and Natural Resources
Division, Department of Justice, Washington, D.C. 20530,
attorneys for Plaintiff, United States of America; and

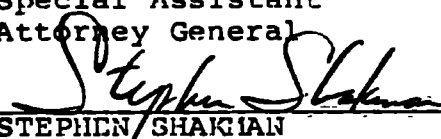
Edward J. Schwartzbauer, William J. Keppel, and Dorsey,
Windhorst, Hannaford, Whitney & Halladay, 2300 First National
Bank Building, Minneapolis, Minnesota 55402, attorneys for
Defendant Reilly Tar & Chemical Corporation; and

Wayne G. Popham, Allen Hinderaker, and Popham, Haik,
Schnobrich, Kaufman & Doty, Ltd., 4344 IDS Center,
Minneapolis, Minnesota 55402, attorneys for
Plaintiff-Intervenor, City of St. Louis Park and Defendant,
Housing and Redevelopment Authority of St. Louis Park,
Minnesota; and

Special Assistant
Attorney General

DENNIS M. COYNE
Special Assistant
Attorney General

BY:


STEPHEN SHAKHIAN
Special Assistant
Attorney General

ATTORNEYS FOR THE
STATE OF MINNEOSTA
1935 West County Road B2
Roseville, Minnesota 55113
Tel. (612) 296-7342

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
FOURTH DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

and

STATE OF MINNESOTA, by its
Attorney General Warren Spannaus,
its Department of Health, and its
Pollution Control Agency,

Civil No. 4-80-469

AFFIDAVIT OF SERVICE

Plaintiff-Intervenor,

v.

REILLY TAR & CHEMICAL CORPORATION;
HOUSING AND REDEVELOPMENT AUTHORITY
OF ST. LOUIS PARK; OAK PARK VILLAGE
ASSOCIATES; RUSTIC OAKS CONDOMINIUM
INC.; and PHILIP'S INVESTMENT CO.,

Defendants.

and

CITY OF ST. LOUIS PARK,

Plaintiff-Intervenor,

v.

REILLY TAR & CHEMICAL CORPORATION,

Defendant.

and

CITY OF HOPKINS,

Plaintiff-Intervenor,

v.

REILLY TAR & CHEMICAL CORPORATION,

Defendant.

STATE OF MINNESOTA)
) ss.
COUNTY OF RAMSEY)

Patricia Schwarz, being duly sworn on oath deposes and says
that in the City of Roseville, county and state aforesaid, on the
14th day of June, 1982, she served the attached "Second Amended
Notice of Taking Oral Deposition", by depositing in the United

States mail at said City of Roseville, true and correct copies thereof, properly enveloped, with postage prepaid, and addressed to:

Francis X. Hermann
Assistant U.S. Attorney
110 S. 4th Street, Room 234
Minneapolis, MN 55401

Erica Dolgin
Room 1507
Environmental Enforcement Section
Land and Natural Resources Div.
U.S. Department of Justice
Washington, D.C. 20530

Wayne G. Popham
Popham, Haik, Schnobrich,
Kaufman & Doty, Ltd.
4344 IDS Center
80 South 8th Street
Minneapolis, MN 55402

Edward Schwartzbauer
Dorsey, Windhorst, Hannaford,
Whitney & Halladay
2200 First Bank Place
Minneapolis, MN 55402

Joseph C. Vesely
Vesely, Otto, Miller
& Keefe PA
Suite 203
Northwestern Bank Bldg.
Hopkins, MN 55343

James T. Swenson
Mackall, Crounse & Moore
1600 TCF Tower
Minneapolis, MN 55402

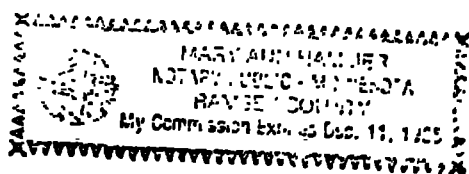
Laurence A. Waldoch
Lindquest & Vennun
IDS Center
80 South Eighth Street
Minneapolis, MN 55402

Thomas W. Wexler
Peterson, Engberg &
Peterson
700 Title Insurance Bldg.
Minneapolis, MN 55401

Patricia Schumacher

Subscribed and sworn to before me
this 14th day of June, 1982.

Mary Ann Hammer
Notary Public



RECEIVED
JUN 18 1982
OFFICE OF REGIONAL COUNSEL
SRA - REGION V